

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: Search Warrant Dated November 5, 2021	Case No.: 21 Misc. 813 (AT)
In re Search Warrant Dated November 3, 2021	Case No.: 21 Misc. 819 (AT)
In re Search Warrant Dated November 3, 2021	Case No.: 21 Misc. 825 (AT)
	PETITIONERS' MOTION FOR LEAVE TO FILE UNDER SEAL

On behalf of all Petitioners, Petitioner Project Veritas respectfully moves for leave to file under seal, pursuant to Rule IV(A) of the Court's Individual Practice Rules, Petitioners' Non-Public Objections to the Special Master's Report and Recommendation. The Non-Public Objections discuss specific documents addressed by the Report and Recommendation that have not been disclosed to the Government's Investigative Team due to claims of privilege under the First Amendment, the Journalistic Privilege and Attorney-Client Privilege. Petitioners' Public Objections will be publicly filed and discuss the law and facts without revealing the contents of documents for which privilege is in dispute.

In accordance with this Court's Rule, Petitioner Project Veritas, Inc., therefore seeks on its own behalf and on behalf of all Petitioners leave to submit the Non-Public Objections under seal.

Dated: May 2, 2023

Respectfully submitted,

/s/ Edward D. Greim

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CERTIFICATE OF SERVICE

This certifies that the foregoing was served via the Court's Electronic Case Filing System on the date of filing, May 2, 2023, to all counsel of record.

/s/ Edward D. Greim

Attorneys for Petitioners